

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - - - -

IN RE: ) MDL No. 2804  
NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )

) Case No.  
This Document Relates To: ) 1:17-md-2804  
)

The County of Lake, Ohio v. ) Judge  
Purdue Pharma L.P., et al. ) Dan Aaron  
Case No. 18-op-45032 ) Polster  
)

The County of Trumbull, Ohio )  
v. Purdue Pharma L.P., )  
et al. )  
Case No. 18-op-45079 )

Track 3 Cases )

- - - - -

Remote Videotaped Deposition of:  
G. CALEB ALEXANDER, M.D.  
Appearing Remotely from  
Baltimore County, Maryland

February 11, 2022  
1:16 p.m.

Reporter: Kristin Wegryn, RMR, CRR  
Appearing Remotely from  
Cuyahoga County, Ohio

1 focusing on the number of individuals who have  
2 opioid use disorder. I appreciate your plan goes  
3 beyond that, as well.

4 But just focusing on the folks who you  
5 estimate have opioid use disorder in Lake and  
6 Trumbull counties, you don't make any distinction  
7 regarding the source of those individuals' opioid  
8 use disorder, correct?

9 A. Well, I call for services and programs  
10 to address different groups of individuals. So,  
11 you know, syringe service programs aren't for  
12 people that aren't using intravenously and the  
13 like.

14 Q. Okay. So folks who -- depending on how  
15 they -- they're currently using their drug. But  
16 what I'm -- I meant it slightly differently, so  
17 let me try to ask my question again.

18 Your abatement plan would provide  
19 treatment services to those individuals who never  
20 took a prescription opioid but became addicted to  
21 illicit opioids, correct?

22 A. Yes. And some -- I mean, there's no  
23 other way to abate the opioid epidemic. I've  
24 never seen an abatement plan that said we're just  
25 going to treat people that are using heroin and